

ATTORNEYS' FEES SUMMARY TABLE

Attorney	Total Hours	Hourly Rate	Total Fees
Andrew Erickson	154.0	\$400.00	\$61,600.00
John M. Sky Starkey	33.0	\$525.00	\$17,325.00
River E.M. Sterne	91.0	\$325.00	\$29,575.00
TOTAL	278.0	-	\$108,500.00

Attorney: Andrew B. Erickson

Date	Total Hours	Hours: Interviews & Conferences	Hours: Obtaining & Reviewing Records	Hours: Legal Research	Hours: Briefs	Hours: Prep & Attend Oral Argument	Hours: Other	Narrative
07/15/2024	0.4	0.4						Emails with counsel regarding requests for amicus brief
07/26/2024	2.0		2.0					Review and analyze State's Opening Brief
08/02/2024	1.5		1.5					Review and analyze amicus briefs of AFWA, Safari Club, and Cato Institute in support of State
08/12/2024	1.7			1.7				Research and analyze cases cited in State's Opening Brief
08/12/2024	4.5				4.5			Outline Answering brief arguments
08/26/2024	1.5			1.5				Research and analyze case law regarding fishing rights and title to fishing rights
08/28/2024	1.0	1.0						Video-conference with Intervenor's counsel regarding briefing strategy
08/28/2024	1.7				1.7			Outline Answering brief arguments, including fishing rights argument structure
08/29/2024	1.7			1.7				Research and analyze case law regarding fishing rights and reserved water rights
08/30/2024	2.6				2.6			Draft Answering brief, including Introduction
09/03/2024	2.0			2.0				Research and analyze Equal Footing Doctrine and submerged lands case law
09/09/2024	4.0				4.0			Draft Answering brief, including Standard of Review and Argument section regarding Statehood Act
09/10/2024	2.6				2.6			Draft Answering brief, including Argument section regarding Miller v. Gammie

09/11/2024	1.0			1.0			Research and analyze case law regarding reserved fishing rights
09/12/2024	1.6			1.6			Research and analyze case law regarding fishing rights
09/16/2024	2.5				2.5		Draft Answering brief, including sections regarding fishing rights and Metlakatla case
09/23/2024	3.4				3.4		Draft Answering brief, including Argument sections regarding fishing rights
09/26/2024	3.7			3.7			Research and analyze case law applying Miller v. Gammie standards
09/27/2024	4.5				4.5		Draft Answering brief, including Argument sections regarding Miller v. Gammie and related case law
09/30/2024	1.4				1.4		Draft Answering brief, including Argument sections regarding application of Miller v. Gammie standards
10/1/2024	1.7	1.7					Conference with R. Sterne regarding fishing rights arguments and title questions
10/4/2024	1.7	1.7					Follow-up conference with R. Sterne regarding arguments and research
10/07/2024	1.4				1.4		Draft Answering brief, including Arguments regarding Sturgeon case
10/08/2024	8.2				8.2		Revise and edit Answering brief, including Introduction and Argument section regarding Sturgeon case
10/09/2024	4.3	4.3					Conferences with R. Sterne and J. Starkey regarding arguments and brief strategy
10/10/2024	5.2				5.2		Draft Answering brief, including revising Argument section regarding Sturgeon
10/10/2024	1.0	1.0					Video-conference with Intervenor counsel regarding brief strategy
10/11/2024	2.0				2.0		Revise and edit Answering brief Introduction
10/13/2024	2.2			2.2			Research and analyze US arguments regarding reserved water rights in Katie John
10/14/2024	4.2				4.2		Draft Answering brief, including Statement of the Case

10/15/2024	3.4				3.4			Draft Answering brief, including Argument sections regarding fishing rights
10/18/2024	2.0		2.0					Review and analyze summary from R. Sterne regarding Katie John briefs
10/19/2024	3.0				3.0			Draft Answering brief, including Statement of the Case
10/20/2024	3.5				3.5			Draft Answering brief, including Statement of the Case
10/21/2024	4.5				4.5			Draft Answering brief, including Argument sections regarding fishing rights and Statehood Act
10/22/2024	4.0				4.0			Draft Answering brief, including Argument section regarding Miller v. Gammie
10/23/2024	5.0				5.0			Revise and edit Answering brief, including citations and add record cites to Joint Supplemental Excerpts of Record
10/24/2024	4.5				4.5			Review and analyze draft Answering briefs of AVCP, KRITFC, and AFN
10/25/2024	8.5				8.5			Revise, edit, and finalize Answering brief
12/9/2024	0.4	0.4						Emails with Intervenor counsel regarding oral argument
12/16/2024	2.4		2.4					Review and analyze State's Reply brief
12/20/2024	0.5						0.5	Draft analysis of State's Reply brief and email to client
01/30/2025	0.4	0.4						Emails with Intervenor counsel regarding oral argument
02/03/2025	1.0			1.0				Research and analyze US arguments in Alaska v. FSB
02/05/2025	0.4	0.4						Emails with Intervenor counsel regarding oral argument strategy
02/06/2025	0.6	0.6						Telephone conference with DOJ regarding oral argument
02/10/2025	1.0	1.0						Video-conference with Intervenor counsel regarding oral argument strategy

02/10/2025	0.8	0.8						Telephone conference with N. Ostrovsky regarding oral argument strategy
02/12/2025	0.5	0.5						Emails with N. Ostrovsky and R. Sterne regarding oral argument strategy
03/03/2025	4.6					4.6		Review and analyze final Answering briefs of AVCP, KRITFC, and AFN, and organize arguments for oral argument
03/13/2025	1.0		1.0					Review and analyze memorandum regarding disclaimer argument
05/21/2025	2.4		2.4					Review and edit response memorandum regarding disclaimer argument
06/01/2025	5.8						5.8	Revise response memorandum regarding disclaimer argument
06/02/2025	0.8						0.8	Revise and edit response memorandum regarding disclaimer argument
06/09/2025	2.4					2.4		Prepare for and attend conference with J. Lindemuth regarding oral argument strategy
06/10/2025	2.8					2.8		Prepare for and attend moot court with Intervenor's counsel
06/13/2025	0.4					0.4		Emails regarding fishing rights argument and oral argument strategy
06/13/2025	2.4					2.4		Draft potential oral argument questions and answers regarding disclaimer clause and fishing rights cases
06/16/2025	1.6					1.6		Draft list of potential questions and short answers for oral argument
06/17/2025	1.5					1.5		Prepare for and attend meeting with J. Lindemuth regarding oral argument preparation
06/18/2025	2.4					2.4		Prepare for and attend moot court with Intervenor's counsel
06/20/2025	0.4					0.4		Emails with Intervenor's counsel regarding oral argument strategy
06/25/2025	0.6		0.6					Review and analyze KRITFC Rule 28(j) letter
06/26/2025	0.8		0.8					Review and analyze State's response to KRITFC Rule 28(j) letter

08/20/2025	0.5		0.5					Review and analyze Ninth Circuit decision
TOTAL	154.0	14.2	13.2	16.4	84.6	18.5	7.1	

Attorney: John M. Sky Starkey

Date	Total Hours	Hours: Interviews & Conferences	Hours: Obtaining & Reviewing Records	Hours: Legal Research	Hours: Briefs	Hours: Prep & Attend Oral Argument	Hours: Other	Narrative
08/23/2024	0.5	0.5						Conference with A. Erickson regarding Answering brief strategy
10/10/2024	1.5	1.5						Conference with A. Erickson, R. Sterne, and Intervenor counsel regarding brief strategy
10/22/2024	1.3				1.3			Review and revise Answering brief
03/03/2025	0.5	0.5						Conference with A. Erickson regarding oral argument strategy
03/04/2025	0.5	0.5						Follow-up conference with A. Erickson regarding oral argument strategy
03/05/2025	0.1	0.1						Conference with A. Erickson regarding draft oral argument outline
03/06/2025	0.5	0.5						Conferences with N. Ostrovsky regarding oral argument strategy
03/06/2025	0.1	0.1						Conference with A. Erickson regarding draft outline for oral argument
03/06/2025	1.0	1.0						Video-conference with Intervenor counsel regarding oral argument strategy
03/06/2025	0.3	0.3						Phone calls with B. Mallott, J. Lindemuth, and N. Ostrovsky regarding oral argument strategy
03/06/2025	0.2	0.2						Conference with N. Ostrovsky regarding oral argument strategy
03/07/2025	0.2	0.2						Emails and telephone calls with AFN regarding non-opposition of motion to postpone oral argument
03/10/2025	0.4	0.4						Telephone conference and emails with DOJ regarding motion to postpone oral argument

03/12/2025	0.1		0.1					Review and analyze State's opposition to motion to postpone oral argument
03/13/2025	1.0	1.0						Telephone conference with Intervenor counsel regarding oral argument strategy
03/13/2025	1.2	1.2						Conference with N. Ostrovsky and A. Sandone regarding disclaimer argument
03/14/2025	0.2		0.2					Review and analyze DOJ reply to State's opposition to motion to postpone oral argument
03/25/2025	2.7	2.7						Video-conference with client regarding litigation strategy
05/12/2025	0.3	0.3						Review and analyze emails from DOJ regarding Federal and State positions
05/19/2025	0.5	0.5						Conference with A. Erickson regarding disclaimer argument and oral argument strategy
05/28/2025	1.7						1.7	Email N. Ostrovsky regarding moot court preparation; conference calls with A. Sandone, A. Erickson, and J. Lindemuth regarding moot court preparation; review SCOTUS dissent by Gorsuch in Apache Stronghold denied petition for certiorari
05/29/2025	0.1	0.1						Meet with R. Sterne and A. Erickson and discuss strategy for preparing for oral argument
05/30/2025	1.6						1.6	Emails and research regarding need to file Acknowledgment of Hearing Notice; emails regarding moot court with J. Lindemuth; read L. Miller response regarding Disclaimer argument
06/02/2025	2.2						2.2	Revise draft memorandum by A. Erickson regarding moot court preparation and research ANCSA regarding same; emails with J. Lindemuth regarding timing of moot court preparation; telephone call with N. Ostrovsky; emails from T. Amdur-Clark regarding preparation for Ninth Circuit Decision in Kake case
06/03/2025	1.5						1.5	Continue to revise A. Erickson memorandum to intervenors regarding disclaimer argument
06/04/2025	2.1						2.1	Read Ninth Circuit Kake Decision and review 2 district court decisions and first Ninth Circuit decision
06/05/2025	0.5						0.5	Prepare for and attend meeting with Ahtna Board via Zoom to report on litigation
06/09/2025	2.5						2.5	Draft questions for pre-moot court discussion with J. Lindemuth, A. Erickson, N. Ostrovsky, A. Sandone, and R. Sterne; participate in discussion via Zoom

06/10/2025	1.9		1.9					Read State letter to Ninth Circuit regarding Kake decision and letter from KRITFC regarding Kake; attend via Zoom moot court for Ninth Circuit Argument
06/11/2025	0.2	0.2						Telephone call with A. Erickson regarding preparation for next moot court and advancing understanding of Disclaimer argument
06/13/2025	0.4	0.4						Telephone call with N. Ostrovsky to debrief moot court; email to A. Erickson regarding drafting questions for next moot court with J. Lindemuth; review Katie John IV District Court opinion
06/17/2025	0.4						0.4	Review T. Amdur-Clark's first draft of opening for oral argument; review A. Erickson draft for J. Lindemuth regarding possible questions and answers
06/18/2025	2.3						2.3	Attend moot court via Zoom; telephone call with R. Sterne and email A. Erickson, regarding same; telephone call with A. Erickson and J. Lindemuth to debrief after moot court; review T. Amdur-Clark's proposed revised opening and respond with email
06/23/2025	1.0					1.0		Listen to moot court; debrief with A. Erickson and A. Sandone
06/25/2025	0.3						0.3	Review R. Sterne email regarding Ninth Circuit en banc rules and process; review Sonosky "sur-reply"
06/26/2025	0.3	0.3						Telephone call with N. Ostrovsky to debrief oral argument; review State reply to Sonosky sur-reply
08/20/2025	0.9		0.9					Read and analyze Kuskokwim decision
Total	33.0	12.5	3.1	0	1.3	1	15.1	

Attorney: River E.M. Sterne

Date	Total Hours	Hours: Interviews & Conferences	Hours: Obtaining & Reviewing Records	Hours: Legal Research	Hours: Briefs	Hours: Prep & Attend Oral Argument	Hours: Other	Narrative
9/16/2024	1.0	1.0						Conference with A. Erickson regarding appeal and necessary research
9/16/2024	3.0			3.0				Research and analyze reserved fishing rights held in trust for tribes by federal government in Alaska Statehood Act
9/17/2024	0.8	0.8						Conference with A. Erickson regarding strategy for brief and necessary research
09/23/2024	1.7			1.7				Survey statehood acts for provisions reserving property interests to federal government
09/30/2024	1.1			1.1				Research and analyze ANCSA extinguishment clause
10/01/2024	0.7	0.7						Conference with A. Erickson regarding brief strategy
10/03/2024	3.0			3.0				Research and analyze statehood acts reserving property rights in trust and less-than-fee property interests
10/09/2024	2.5				2.5			Revise and edit Answering brief
10/10/2024	3.0			3.0				Research and analyze 1999 subsistence regulations and United States' theory of reserved water rights doctrine
10/10/2024	1.8	1.8						Conference with Intervenor's counsel regarding brief strategy
10/11/2024	0.1	0.1						Emails with A. Erickson regarding brief strategy
10/11/2024	4.9				4.9			Draft Answering brief, including Statement of the Case
10/14/2024	2.1				2.1			Revise and edit Statement of the Case

10/14/2024	0.5				0.5			Revise and edit Answering brief
10/14/2024	0.1	0.1						Emails with A. Erickson regarding brief strategy
10/14/2024	0.2	0.2						Emails with A. Erickson regarding reserved water rights doctrine
10/14/2024	0.7			0.7				Review and analyze submerged lands and federal reserved rights research
10/15/2024	0.2				0.2			Revise and edit Answering brief
10/15/2024	0.9			0.9				Research and analyze federal government's intentions regarding reservation of fishing right at statehood
10/15/2024	0.1	0.1						Emails with A. Erickson regarding Statement of the Case revisions
10/15/2024	3.7			3.7				Analyze and summarize research findings regarding submerged lands, statehood acts, and fishing rights
10/15/2024	0.3	0.3						Conference with A. Erickson regarding brief strategy
10/15/2024	0.5			0.5				Research and analyze responses to State's counterarguments
10/15/2024	0.1	0.1						Conference with A. Erickson regarding additional drafting and research
10/16/2024	0.2	0.2						Emails with A. Erickson regarding brief revisions
10/16/2024	7.0			6.0	1.0			Research and analyze case law and canons of construction; revise and edit Statement of the Case
10/17/2024	3.0				3.0			Draft Answering brief, including federal reserved fishing rights argument
10/21/2024	0.3				0.3			Revise and edit Answering brief
10/21/2024	0.7				0.7			Revise and edit Answering brief
10/21/2024	0.6	0.6						Conference with A. Erickson regarding necessary edits and additions to Answering brief

10/22/2024	0.1	0.1					Emails with A. Erickson regarding brief strategy
10/22/2024	0.2			0.2			Research and analyze Loper Bright decision and agency deference canons
10/22/2024	0.1	0.1					Emails with A. Erickson regarding further research
10/22/2024	1.4				1.4		Revise and edit Answering brief; emails with A. Erickson regarding further research
10/23/2024	1.0				1.0		Revise and edit Answering brief
10/23/2024	0.1	0.1					Emails with A. Erickson regarding Hynes v. Grimes decision and further supplemental research for Answering brief
10/23/2024	1.7			1.7			Research and analyze Hynes v. Grimes for support on Section III.C of draft brief
10/23/2024	0.2				0.2		Revise and edit Answering brief
10/23/2024	0.4	0.4					Conference with A. Erickson regarding supplemental research and additions to brief
10/23/2027	1.1				1.1		Review and analyze draft KRITFC brief
10/24/2024	1.2			0.6	0.6		Review and analyze draft KRITFC brief and cited cases
10/24/2024	1.1			0.6	0.5		Review and analyze submerged lands Supreme Court cases and incorporate into Answering brief
10/24/2024	0.1	0.1					Conference with A. Erickson regarding further research
10/24/2024	1.8				1.8		Incorporate additional quotations, citations, and line edits to Answering brief
10/24/2024	2.2			1.8	0.4		Review and analyze recent federal case law regarding distinction between aboriginal title and trust title; review and analyze NARF final brief; line edit Answering brief
10/25/2024	2.7				2.7		Finalize line edit of Answering brief
10/25/2024	0.9				0.9		Review Answering brief table of authorities for accuracy

10/25/2024	1.2	0.2			1.0			Revise and edit Answering brief; conference with A. Erickson regarding same
10/25/2024	0.4				0.4			Review and analyze United States Answering brief
12/16/2024	3.7	0.5			3.2			Review and analyze State's reply brief; confer with J. Starkey regarding developments in appeal
12/19/2024	1.3	0.2			1.1			Summarize and analyze State's reply to Ahtna fishing rights argument; identify and distill core points to raise at oral argument; confer with A. Erickson regarding same
12/20/2024	0.1				0.1			Review and analyze pivotal arguments to be raised at oral argument
01/30/2025	0.1	0.1						Emails with A. Erickson regarding oral argument
01/31/2025	0.1						0.1	Review emails from DOJ regarding oral argument
02/03/2025	0.2	0.2						Conference call with A. Erickson, A. Sandone, and N. Ostrovsky regarding oral argument
02/06/2025	0.7	0.7						Conference call with DOJ and Intervenors regarding oral argument; confer with A. Erickson regarding same
02/10/2025	1.3	1.3						Strategy call with Intervenors; confer with A. Erickson regarding same
02/17/2025	2.0					2.0		Draft oral argument outline
02/21/2025	0.7					0.7		Prepare case chart for oral argument preparation
02/24/2025	0.7					0.7		Review and analyze Intervenors' briefs; continue drafting oral argument outline
02/28/2025	0.5	0.5						Confer with A. Erickson regarding oral argument outline and strategy
03/03/2025	1.2	0.2				1.0		Emails with A. Erickson and J. Starkey regarding oral argument; review AFN and AVCP briefs; conference with A. Erickson regarding same
03/04/2025	1.0	0.6				0.4		Review updated oral argument outline and Intervenor brief argument chart; teleconference with N. Ostrovsky, A. Sandone, and A. Erickson regarding same
03/06/2025	1.1	1.1						Video-conference with Intervenors to discuss oral argument strategy

03/07/2025	0.3	0.2		0.1			Call and emails with J. Starkey regarding oral argument; review and analyze new federal orders regarding law firms and federal litigation
03/12/2025	0.1					0.1	Review and analyze State Opposition to U.S. Motion to Reschedule
03/13/2025	1.4	0		1.4			Research and analyze case law regarding fishing rights held by U.S. by virtue of sovereign power
05/12/2025	0.1					0.1	Review and analyze Joint Status Report and Request for Oral Argument by State and U.S.
05/21/2025	1.1	0.2				0.9	Revise and edit argument outline regarding reserved fishing rights held in trust; conference with A. Erickson and J. Starkey regarding same
05/22/2025	0.5					0.5	Final review of reserved fishing rights outline for transmittal to Intervenor
05/30/2025	0.2					0.1	0.1 Review L. Miller response to Ahtna memo regarding trust fishing rights; review Ninth Circuit rules for filing acknowledgment of hearing
06/02/2025	1.0					1.0	Revise and edit memorandum regarding disclaimer argument; conference with A. Erickson regarding same
06/03/2025	1.1			0.5		0.6	Revise and edit memorandum regarding disclaimer argument; research federal statutes recognizing Alaska Native subsistence rights
06/04/2025	0.6			0.3		0.3	Research and update case citations regarding congressional recognition of Alaska Native subsistence rights following passage of ANCSA
06/09/2025	1.0					1.0	Emails regarding memorandum regarding disclaimer argument; review J. Starkey questions for KRIFTC and AFN; attend moot court prep with counsel for AFN; review recent Kake decision and related case law in preparation for moot
06/10/2025	1.8					1.8	Attend moot court with Intervenor counsel
06/17/2025	2.5			0.5		2.0	Prepare for and attend pre-moot strategy session with AFN counsel, A. Erickson, and A. Sandone; research cases involving fishing rights and statehood legislation in Lower 48; research congressional ratification cases
06/18/2025	1.5			0.5		1.0	Prepare for and attend moot court; research and analyze congressional ratification cases
06/25/2025	0.2						0.2 Review and analyze KRIFTC Rule 28(j) letter

06/26/2025	0.2						0.2	Review and analyze State's response to KRITFC Rule 28(j) letter
TOTAL	91.0	12.8	0	31.8	31.6	14.1	0.7	